

Steve W. Berman (*pro hac vice*)
 Mark S. Carlson (*pro hac vice*)
 HAGENS BERMAN SOBOL SHAPIRO LLP
 1301 Second Ave., Suite 2000
 Seattle, WA 98101
 Telephone: (206) 623-7292
 Facsimile: (206) 623-0594
 steve@hbsslaw.com
 markc@hbsslaw.com

Philip Graves (CBA No. 153441)
 HAGENS BERMAN SOBOL SHAPIRO LLP
 301 North Lake Avenue, Suite 920
 Pasadena, CA 91101
 Telephone: (213) 330-7150
 Facsimile: (213) 330-7152
 philipg@hbsslaw.com

Rio S. Pierce, (SBN 298297)
 HAGENS BERMAN SOBOL SHAPIRO LLP
 715 Hearst Avenue, Suite 202
 Berkeley, CA 94710
 Telephone: (510) 725-3000
 Facsimile: (510) 725-3001
 riop@hbsslaw.com

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

REARDEN LLC, et al.,

 Plaintiffs,

 v.
 THE WALT DISNEY COMPANY, *et al.*,

 Defendants.

No. 4:17-CV 04006-JST-SK
 No. 4:17-CV-04191-JST-SK

**DECLARATION OF MARK S.
 CARLSON IN OPPOSITION TO
 DEFENDANTS' MOTION TO
 EXCLUDE PORTIONS OF
 DECLARATION OF ANGELA
 TINWELL**

REARDEN LLC, et al.,

 Plaintiffs,

 v.
 TWENTIETH CENTURY FOX FILM
 CORPORATION, *et al.*,

 Defendants.

Judge: Hon. Jon S. Tigar
 Date: To be set
 Time: To be set

Ctrm.: 6, 2nd Floor

1 I, MARK CARLSON, declare as follows:

2 1. I am an attorney with Hagens Berman Sobol Shapiro LLP, and I am one of the firm's
3 lawyers representing the plaintiffs in this case. I have personal knowledge of the facts stated in this
4 declaration, and could testify with respect to those facts under oath if called upon to do so.

5 2. The document attached as Exhibit 1 is a true and correct copy of excerpts from the
6 transcript of the deposition of Angela Tinwell cited in Rearden's Opposition to Defendants' Motion
7 to Exclude Portions of the Declaration of Angela Tinwell.

8 3. The document attached as Exhibit 2 is a true and correct copy of the *curriculum vitae*
9 of Angela Tinwell, which was attached to her declaration as Exhibit 2, ECF No. 264-18. At my
10 request, Dr. Tinwell highlighted the publications that (a) she relied upon in forming the opinions
11 expressed in her declaration, and (b) were subject to peer review, as shown on Exhibit 1 hereto.

12 4. The document attached as Exhibit 3 is a true and correct copy of excerpts from the
13 deposition of Hao Li cited in Rearden's Opposition to Defendants' Motion to Exclude Portions of the
14 Declaration of Angela Tinwell.

15 5. The document attached as Exhibit 4 is a true and correct copy of the "Home" web
16 page for MOVA, <http://www.mova.com>, which was accessed at my direction on January 8, 2021.

17 6. The document attached as Exhibit 5 is a true and correct copy of the "Gallery :
18 CONTOUR Reality Capture Examples" web page for MOVA, <http://www.mova.com/gallery.php>,
19 which was accessed at my direction on January 8, 2021.

20 7. The document attached as Exhibit 6 is a true and correct copy of a web page titled
21 "TRON: Legacy Movie Review" dated December 13, 2010,
22 <https://www.shockya.com/news/2010/12/13/tron-legacy-movie-review>, which was accessed at my
23 direction on January 14, 2021.

24 8. The document attached as Exhibit 7 is a true and correct copy of a web page titled
25 "Film Review: TRON: Legacy" dated December 17, 2020,
26 <http://www.fanthefiremagazine.com/film/film-review-tron-legacy/>, which was accessed at my
27 direction on January 14, 2021.
28

1 9. The document attached as Exhibit 8 is a true and correct copy of a web page titled
2 “Film Review: TRON: Legacy” dated December 17, 2020, [https://cine-vue.com/2010/12/film-](https://cine-vue.com/2010/12/film-review-tron-legacy.html)
3 [review-tron-legacy.html](https://cine-vue.com/2010/12/film-review-tron-legacy.html), which was accessed at my direction on Janaury 14, 2021.

4 10. The document attached as Exhibit 9 is a true and correct copy of a web page titled
5 “Visually stunning but bumnumbing Tron” dated December 9, 2010,
6 [https://www.smh.com.au/entertainment/movies/visually-stunning-but-bum-numbing-tron-20101209-](https://www.smh.com.au/entertainment/movies/visually-stunning-but-bum-numbing-tron-20101209-18qmj.html)
7 [18qmj.html](https://www.smh.com.au/entertainment/movies/visually-stunning-but-bum-numbing-tron-20101209-18qmj.html), which was accessed at my direction on Janaury 14, 2021.

8 11. The document attached as Exhibit 10 is a true and correct copy of a web page titled
9 “TRON: Legacy -Disney+ Talk” dated April 15, 2020,
10 <https://battleroyalewithcheese.com/2020/04/tron-legacy-disney-talk/>, which was accessed at my
11 direction on Janaury 14, 2021.

12 12. The document attached as Exhibit 11 is a true and correct copy of a web page titled
13 “Jeff Bridges Double Feature: True Grit andTron: Legacy” dated December 28, 2010,
14 https://www.huffpost.com/entry/jeff-bridges-double-featu_b_798615, which was accessed at my
15 direction on Janaury 14, 2021.

16 13. The document attached as Exhibit 12 is a true and correct copy of a web page titled
17 “The Curious Case of Benjamin Button”, [https://www.tvguide.com/movies/curious-case-benjamin-](https://www.tvguide.com/movies/curious-case-benjamin-button/review/293210)
18 [button/review/293210](https://www.tvguide.com/movies/curious-case-benjamin-button/review/293210), which was accessed at my direction on Janaury 14, 2021.

19 14. The document attached as Exhibit 13 is a true and correct copy of a web page titled
20 “See 'Benjamin Button,' just don't try to guess his age”,
21 https://usatoday30.usatoday.com/life/movies/reviews/2008-12-23-benjamin-button_N.htm, which
22 was accessed at my direction on Janaury 14, 2021.

23 15. The document attached as Exhibit 14 is a true and correct copy of a web page titled
24 “'Button' Bends Time Into Grand Fable” dated December 25, 2008,
25 <https://www.wsj.com/articles/SB123015087021633387>, which was accessed at my direction on
26 Janaury 14, 2021.

I declare that the foregoing is true and correct under penalty of perjury.

DATED: January 15, 2021

Signed in Seattle, Washington, by:

/s/ Mark Carlson

Mark Carlson